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|--------------------------------------|---|-------------------|
| ISAAC MORRIS, LTD                    | ) | Adv. No. 05-53237 |
| GMAC COMMERCIAL FINANCE LLC          | ) |                   |
|                                      | ) |                   |
| ISAAC MORRIS, LTD. d/b/a E-Baby      | ) | Adv. No. 06-50004 |
| GMAC COMMERCIAL FINANCE LLC          | ) |                   |
|                                      | ) |                   |
| OUTERSTUFF, LTD.                     | ) | Adv. No. 06-50132 |
| GMAC COMMERCIAL FINANCE LLC          | ) |                   |
|                                      | ) |                   |
| PARK B. SMITH, INC. d/b/a SMITH AND  | ) | Adv. No. 05-30479 |
| JOHNSON and d/b/a PARK B. SMITH LTD. | ) |                   |
| and PARK B. SMITH SR.                | ) |                   |
| GMAC COMMERCIAL FINANCE LLC          | ) |                   |
|                                      | ) |                   |
| RK INDUSTRIES INC.                   | ) | Adv. No. 06-50298 |
| GMAC COMMERCIAL FINANCE, LLC         | ) |                   |
|                                      | ) |                   |
| SILVER GOOSE, INC.                   | ) | Adv. No. 05-30463 |
| GMAC COMMERCIAL FINANCE LLC          | ) |                   |
|                                      | ) |                   |
| SOLED OUT SOCKS INC.                 | ) | Adv. No. 05-30100 |
| GMAC COMMERCIAL CREDIT               | ) |                   |
|                                      | ) |                   |
| STAR REGENT APPAREL, INC.            | ) | Adv. No. 05-30476 |
| STAR REGENT INTERNATIONAL INC.       | ) |                   |
| GMAC COMMERCIAL FINANCE LLC          | ) |                   |
|                                      | ) |                   |
| WIESNER PRODUCTS, INC.               | ) | Adv. No. 06-50365 |
| GMAC COMMERCIAL FINANCE LLC          | ) |                   |
|                                      | ) |                   |
| Defendants.                          | ) |                   |

**MOTION FOR WITHDRAWAL OF THE REFERENCE  
UNDER 28 U.S.C. §157(d) AND FED. R. BANKR. P. 5011**

COMES NOW Defendant GMAC Commercial Finance LLC ("Defendant" or "GMAC CF"), pursuant to 28 U.S.C. §157(d) and Fed. R. Bankr. P. 5011 and requests that the reference be withdrawn in the above-captioned adversary proceedings for those reasons more fully set forth in its Memorandum in Support of Motion for Withdrawal of the Reference Under 28 U.S.C.

§157(d) and Fed. R. Bankr. P. 5011 filed contemporaneously herewith and expressly incorporated herein by reference.

Respectfully Submitted,

Dated: August 16, 2007  
Wilmington, Delaware

EDWARDS ANGELL PALMER & DODGE LLP

/s/ Denise Seastone Kraft

Stuart M. Brown (NO. 4050)  
Denise Seastone Kraft (No. 2778)  
Mark D. Oliveri (No. 4291)  
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dkraft@eapdlaw.com  
moliveri@eapdlaw.com

*Counsel for GMAC Commercial Finance LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|   |   |                         |
|---|---|-------------------------|
| In re:                                  | ) |                         |
| FACTORY 2-U STORES, INC. a/k/a          | ) | Chapter 7               |
| FACTORY 2-U f/a/k/a GENERAL TEXTILES,   | ) |                         |
| INC., f/a/k/a GENERAL TEXTILES, f/a/k/a | ) | Case No. 04-10111 (PJW) |
| FAMILY BARGAIN CORPORATION, f/a/k/a     | ) |                         |
| FAMILY BARGAIN CENTER,                  | ) |                         |
|   | ) |                         |
| Debtor.                                 | ) |                         |
| <hr/>                                   |   |                         |
| JEOFFREY L. BURTCH,                     | ) |                         |
| Chapter 7 Trustee                       | ) |                         |
|   | ) |                         |
| Plaintiff                               | ) |                         |
|   | ) |                         |
| v.                                      | ) |                         |
|   | ) |                         |
| ACCESSORY NETWORK GROUP, LLC            | ) | Adv. No. 06-50378       |
| a/k/a ACCESSORY NETWORK GROUP           | ) |                         |
| GMAC COMMERCIAL FINANCE LLC             | ) |                         |
|   | ) |                         |
| ALL-WAYS SPORTSWEAR, LTD.               | ) | Adv. No. 06-50035       |
| GMAC COMMERCIAL FINANCE LLC             | ) |                         |
|   | ) |                         |
| AMERICAN MARKETING ENTERPRISES, INC.)   | ) | Adv. No. 06-50220       |
| GMAC COMMERCIAL FINANCE LLC             | ) |                         |
|   | ) |                         |
| AMICA APPAREL CORP. d/b/a SQUEEZE KIDS  | ) | Adv. No. 06-50379       |
| GMAC COMMERCIAL FINANCE LLC             | ) |                         |
|   | ) |                         |
| ATLANTIC HOSIERY, INC.                  | ) | Adv. No. 05-30477       |
| GMAC COMMERCIAL FINANCE LLC             | ) |                         |
|   | ) |                         |
| FAST FORWARD, LLC                       | ) | Adv. No. 05-30156       |
| GMAC COMMERCIAL FINANCE                 | ) |                         |
|   | ) |                         |
| GREAT WALL CORP.                        | ) | Adv. No. 06-50041       |
| GMAC COMMERCIAL FINANCE LLC             | ) |                         |
|   | ) |                         |
| HAYWIN TEXTILE PRODUCTS                 | ) | Adv. No. 06-50246       |
| GMAC COMMERCIAL FINANCE LLC             | ) |                         |

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| ISAAC MORRIS, LTD. d/b/a E-Baby      | ) | Adv. No. 06-50004 |
| GMAC COMMERCIAL FINANCE LLC          | ) |                   |
|                                      | ) |                   |
| OUTERSTUFF, LTD.                     | ) | Adv. No. 06-50132 |
| GMAC COMMERCIAL FINANCE LLC          | ) |                   |
|                                      | ) |                   |
| PARK B. SMITH, INC. d/b/a SMITH AND  | ) | Adv. No. 05-30479 |
| JOHNSON and d/b/a PARK B. SMITH LTD. | ) |                   |
| and PARK B. SMITH SR.                | ) |                   |
| GMAC COMMERCIAL FINANCE LLC          | ) |                   |
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| RK INDUSTRIES INC.                   | ) | Adv. No. 06-50298 |
| GMAC COMMERCIAL FINANCE, LLC         | ) |                   |
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| GMAC COMMERCIAL FINANCE LLC          | ) |                   |
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| STAR REGENT INTERNATIONAL INC.       | ) |                   |
| GMAC COMMERCIAL FINANCE LLC          | ) |                   |
|                                      | ) |                   |
| WIESNER PRODUCTS, INC.               | ) | Adv. No. 06-50365 |
| GMAC COMMERCIAL FINANCE LLC          | ) |                   |
|                                      | ) |                   |
| Defendants.                          | ) |                   |

### **ORDER WITHDRAWING REFERENCE**

This matter comes before the Court on the Motion (the “Motion”) of Defendant GMAC Commercial Finance LLC, made pursuant to 28 U.S.C. § 157(d), to withdraw the standing order of reference, thereby transferring jurisdiction of the above-captioned proceedings from the United States Bankruptcy Court for the District of Delaware to the United States District Court for the District of Delaware. Having duly considered the submission of the parties, the Court **GRANTS** the Motion.

Accordingly, it is **HEREBY ORDERED** that pursuant to 28 U.S.C. § 157(d) jurisdiction of the above-captioned adversary proceedings is withdrawn from the United States Bankruptcy Court for the District of Delaware and jurisdiction to hear and determine the adversary proceedings shall be in the United States District Court for the District of Delaware.

Dated: \_\_\_\_\_, 2007  
Wilmington, Delaware

\_\_\_\_\_  
United States District Judge

**CERTIFICATE OF SERVICE**

I, Denise Seastone Kraft, hereby certify that on the 16th day of August, 2007, I caused a copy of the Motion for Withdrawal of the Reference Under 28 U.S.C. §157(d) and Fed. R. Bankr. P. 5011 to be served upon the parties listed below in the manner indicated:

**VIA HAND DELIVERY**

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Isaac Morris, Ltd. d/b/a E-Baby*

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*Counsel to Amica Apparel Corp.  
d/b/a Squeeze Kids*

/s/ Denise Seastone Kraft  
Denise Seastone Kraft (No. 2778)

**TRANSMITTAL SHEET FOR WITHDRAWAL OF REFERENCE TO THE  
U.S. DISTRICT COURT FOR THE DISTRICT OF DELAWARE**

**Adversary Case #:** 06-50035 (KJC)

**Related Bankruptcy Case #:** 04-10111 (KJC)

**District Court Civil Action#:**

**Deputy Clerk Transferring Case:** Sherry A. Johnson

**Case Type:** Adversary

**Nature of Suit:** 454 Recover Money/Property

**Cause of Transmittal:** Motion to Withdrawal the Reference to the U.S.  
District Court

**Parties:** Jeoffrey L. Burtch, Ch. 7 Trustee v. All-Ways  
Sportswear, Ltd. , GMAC Commercial Finance  
L.L.C.

**Plaintiff's Counsel:** George R. Tsakataras (***LEAD ATTORNEY***)  
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